

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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KEENAN T. KNIGHT,

Plaintiff,

v.

Case No. 23-cv-886

AMIKA AVERY,  
JORDAN TAYLOR, and  
TERRELL WILLIAMS,

Defendants.

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**RESPONSE TO MOTION TO COMPEL**

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Plaintiff Keenan T. Knight has moved this Court to compel discovery responses from the Defendants. (ECF No. 25). His motion must be denied for several reasons.

First, Civ. L.R. 37 requires that all motions to compel “be accompanied by a written certification by the movant that, after the movant in good faith has conferred or attempted to confer with the person or party failing to make disclosure in an effort to obtain it without court action, the parties are unable to reach an accord.” Such conference has not occurred here.

Next, the Defendants responded to Plaintiff’s discovery requests. It appears as though Plaintiff is seeking responses to his March 19, 2024 discovery request, which was his second request for the production of documents. At the time this request was served, it was untimely. However, after the court extended deadlines (Text Only Order, May 8, 2024), in an effort to be accommodating to a pro se plaintiff, the Defendants explained to Mr. Knight that they would respond before the close of discovery. (ECF No. 23).

On June 13, 2024, the Defendants responded to Plaintiff's March 19, 2024 discovery requests. (Nikolay Decl., ¶ 4). The exhibits provided to Plaintiff in this response totaled over 2,800 pages. (Nikolay Decl., ¶ 5). It is the Defendants' position that this discovery request has been responded to in full. To the extent Plaintiff takes issue with particular responses, the undersigned requests that Plaintiff write or call defense counsel to discuss the specific responses with which he takes issue, as is required by this Court's local rules.

Dated at Milwaukee, Wisconsin this 8th day of July, 2024.

SCOTT F. BROWN  
Milwaukee County Acting Corporation Counsel

BY: s/ Dale R. Nikolay  
DALE R. NIKOLAY  
Assistant Corporation Counsel  
State Bar No. 1002447  
Attorney for Defendants, Amika Avery, Jordan  
Taylor, and Terrell Williams

**P.O. Mailing Address:**

Milwaukee County Office of Corporation Counsel  
901 North 9th Street, Room 303  
Milwaukee, WI 53233  
Telephone: (414) 278-4087  
Facsimile: (414) 223-1249  
Email: dale.nikolay@milwaukeecountywi.gov